

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION**

NORCAL TEA PARTY PATRIOTS, et al.,)
ON BEHALF OF THEMSELVES,)
THEIR MEMBERS, and THE CLASS)
THEY REPRESENT,)

Plaintiffs,)

v.)

THE INTERNAL REVENUE SERVICE, et al.,)

Defendants.)

Case No. 1:13-cv-00341

Judge Michael R. Barrett

AGREED ORDER UNSEALING CERTAIN DOCUMENTS

The Plaintiffs, the Defendants Internal Revenue Service (“IRS”), and the United States of America, and the Individual Management Defendants, hereby stipulate that the following documents may be unsealed:

Docket No.	Date	Filing
198	8/31/15	United States’ Memorandum in Opposition to Plaintiffs’ Motion for Class Certification and all attachments (198-1 and 198-2)
199	9/14/15	Plaintiffs’ Reply in Support of Motion for Class Certification
223	1/12/16	Order Granting Motion for Class Certification
233	2/19/16	Plaintiffs’ Memorandum in Opposition to the United States’ Motion for Partial Summary Judgment and all attachments (233-1 to 233-3)
244	3/15/16	Reply in Support of United States’ Motion for Partial Summary Judgment and all attachments (244-1 to 244-8)
263	4/1/16	Plaintiff Texas Patriots Tea Party’s Reply in Support of Motion for Preliminary Injunction and all attachments (263-1 to 263-2)
297	11/4/16	Opinion & Order re: Government’s Motion for Partial Summary Judgment and Plaintiff Texas Patriots Tea Party’s Motion for Preliminary Injunction
308	12/1/16	Exhibit A to Plaintiff Texas Patriots Tea Party’s Memorandum in Support of Motion to Clarify Preliminary Injunction (TPTP Application File)
354	7/21/17	Exhibits 1-26 to United States’ Statement of Proposed Undisputed Material Facts in Support of its Motion for Summary Judgment on Class Action Claim and all attachments (354-1 to 354-26)

355, except 355-17 and 355-18 are to remain under seal	7/21/17	Exhibits 27-42 and Exhibits 45-52 to United States' Statement of Proposed Undisputed Material Facts in Support of its Motion for Summary Judgment on Class Action Claim and attachments 1-16, 19-26 (355-1 to 355-16 and 355-19 to 355-26). Attachments 355-17 and 355-18 (i.e., Exhibits 43-44) are to remain under seal.
356	7/21/17	Exhibits 53-76 to United States' Statement of Proposed Undisputed Material Facts in Support of its Motion for Summary Judgment on Class Action Claim and all attachments. (356-1 to 356-24)
357-1 to 357-3 The Main Document (357) is to remain under seal.	7/21/17	Attachments to United States' United States' Statement of Proposed Undisputed Material Facts in Support of its Motion for Summary Judgment on Class Action Claim (357-1 to 357-3). The Main Document (357) is to remain under seal.

IT IS SO ORDERED.

Date: September 19, 2017

s/Michael R. Barrett
Hon. Michael R. Barrett
United States District Judge

WE SO MOVE:

/s/ Mark Hayden

Mark Hayden (OH 0066162)
TAFT STETTINIUS & HOLLISTER
LLP
425 Walnut Street, Suite 1800
Cincinnati, OH 45202
(513) 381-2838
mhayden@taftlaw.com

/s/ Brigida Benitez

Brigida Benitez (*Pro Hac Vice*)
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 429-3000
bbenitez@steptoe.com

Counsel for Defendants Steven F. Bowling, Bonnie Esrig, Joseph Grant, Sarah Hall Ingram, Lois G. Lerner, Brenda Melahn, Steven T. Miller, Holly Paz, Douglas Shulman, Cindy Thomas, and William Wilkins in their individual capacities

DAVID A. HUBBERT
Acting Assistant Attorney General
Tax Division

s/ Joseph A. Sergi

JOSEPH A. SERGI (DC 480837)
Senior Litigation Counsel
U.S. Department of Justice, Tax
Division
555 4th Street, N.W., JCB 7207
Washington, D.C. 20001
(202) 305-0868; (202) 307-2504
(FAX)
Joseph.A.Sergi@usdoj.gov

Of Counsel:

BENJAMIN C. GLASSMAN
United States Attorney
MATTHEW J. HORWITZ (OH
0082381)
Assistant United States Attorney
221 East Fourth Street, Suite 400
Cincinnati, Ohio 45202
(513) 684-3711
Matthew.Horwitz@usdoj.gov

LAURA M. CONNER (VA 40388)
STEVEN M. DEAN (DC 1020497)
JOSEPH R. GANAHL (MD)
JEREMY N. HENDON (OR 982490)
Trial Attorneys
U.S. Department of Justice, Tax
Division
555 4th Street, N.W.
Washington, D.C. 20001
(202) 514-2000

Counsel for the Defendant United States of America

/s/ Edward D. Greim

Edward D. Greim (*Pro Hac Vice*)
Todd P. Graves (*Pro Hac Vice*)
Dane C. Martin (*Pro Hac Vice*)
GRAVES GARRETT LLC
1100 Main Street, Suite 2700
Kansas City, MO 64105
(816) 256-3181
edgreim@gravesgarrett.com

Bill Randles (*Pro Hac Vice*)
Bev Randles (*Pro Hac Vice*)
BILL & BEV RANGLES LAW
GROUP, LLP
5823 N. Cypress Avenue
Kansas City, MO 64119
(816) 820-1973
bill@billrandles.com

Counsel for Plaintiffs

David R. Langdon (OH 0067046)
Joshua B. Bolinger (OH 0079594)
LANGDON LAW LLC
8913 Cincinnati-Dayton Road
West Chester, OH 45069
(513) 577-7380
dlangdon@langdonlaw.com
Christopher R. Finney (OH 0038998)
THE FINNEY LAW FIRM
4270 Ivy Pointe Blvd.
Cincinnati, OH 45245
(513) 943-6655
chris@finneylawfirm.com